IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BIS ADVANCED SOFTWARE SYSTEMS, LTD.,	
Plaintiff,	
v.	Civil Action No. 04cv11960 (RWZ)
RED BEND SOFTWARE, INC., RED BEND, LTD., TIME WARNER INC., ICQ, INC. INSTALLSHIELD SOFTWARE CORP., and SCAN SOFT, INC.	
Defendants.	

DEFENDANT'S MOTION TO FILE UNDER SEAL

Pursuant to Local Rule 7.2, Defendants Red Bend Software, Inc. and Red Bend, Ltd., (collectively "Red Bend") hereby move for leave to file the Declaration of Yoram Salinger ("Salinger Declaration") under seal. As grounds for this motion, Red Bend states as follows:

The Salinger Declaration contains highly-confidential, sensitive business information concerning the details of a new set of products being developed by Red Bend. Such information is subject to the protection contemplated by Rule 26(c) of the Federal Rules of Civil Procedure and provided for by the Protective Order entered in this case. Accordingly, pursuant to the terms of the Protective Order in place in this action, Red Bend seeks to file the Salinger Declaration under seal.

WHEREFORE, Red Bend respectfully requests that this Court grant leave to file the Salinger Declaration under seal.

**RED BEND SOFTWARE, INC., RED BEND,
LTD.,**

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Dated: December 15, 2005

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), the undersigned counsel hereby certifies that counsel for Defendants attempted to contact and left telephone messages for two attorneys representing Plaintiff on December 15, 2005, but had received no response from either prior to the filing of this Motion.

/s/ Anastasia M. Fernands
Anastasia M. Fernands

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